

Message

From: Rate, Debra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0C0E1880FB9B493393C0C6FA694EDF5F-DEBRA RATE]
Sent: 1/6/2021 2:14:37 PM
To: Fitz, Nancy [Fitz.Nancy@epa.gov]
CC: Walsh, Michael [Walsh.Michael@epa.gov]
Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you, Nancy, for sending the alert to the EFED Team. Debra

From: Fitz, Nancy <Fitz.Nancy@epa.gov>
Sent: Wednesday, January 06, 2021 9:03 AM
To: Holmes, Jean <Holmes.Jean@epa.gov>; Negron-Encarnacion, Ideliz <Negron-Encarnacion.Ideliz@epa.gov>
Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: FW: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jean and Ideliz,

Just a quick FYI that Corteva did submit additional data and white papers to address the deficiencies for the methoxyfenozide minor use tolerance petition on rice before the holidays.

As you probably are aware, there is a big backlog in the 21-day screening process so we don't know when this information will actually be available.

I know that Debra is swamped with aldicarb right now but hopefully she'll be able to come up for air in a week or two.

Nancy

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Monday, January 04, 2021 3:18 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hello Debra;

I just wanted to let you know that we made our submission of the additional data and white papers to address the deficiencies for the methoxyfenozide minor use tolerance petition on rice on December 22, 2020.

Please let me know if you require anything additional.

Thank you!

Jenn

From: helpdesk@epacdx.net <helpdesk@epacdx.net>
Sent: Tuesday, December 22, 2020 10:59 AM
To: Galvin, Cathy <cathy.galvin@corteva.com>
Subject: [EXTERNAL] CDX PSP Package Transmitted to OPP

Your PSP package (Methoxyfenozide Petition Import Tolerance & NOF Rice Deficiency Response) for DOW AGRO SCIENCES (62719) has been successfully transmitted to OPP.

Below are the application(s) included in this package and their tracking number(s):
ToIPet-New-000001: CDX_2020_013811

Company Name: DOW AGRO SCIENCES
Company Number: 62719

If you have questions concerning this message, you may contact the CDX Help Desk by email at helpdesk@epacdx.net or by calling the CDX Technical Support Staff through our toll free telephone support on (888) 890-1995 between Monday through Friday from 8:00 am to 6:00 pm EST/EDT. For International callers, the CDX Help Desk can also be reached at (970) 494-5500.

CDX Homepage
<https://cdx.epa.gov>

From: Hughes, Jenn
Sent: Tuesday, December 1, 2020 8:43 AM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you Debra!

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Tuesday, December 1, 2020 8:40 AM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

Thank you again for sending out the draft meeting minutes. I sent them to the team for review and comment. Attached is an updated version of the meeting minutes with some added text/comments from the team. Please let us know if you have any questions or concerns.

Thank you again.
Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Tuesday, November 10, 2020 4:32 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you.

From: Rate, Debra <Rate.Debra@epa.gov>

Sent: Tuesday, November 10, 2020 4:12 PM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

Thank you for providing the meeting minutes for the conference call last week (11/2/20) with the agency. I have sent them out to the meeting participants for review and have asked them to provide any comments/input, they have in an effort to ensure that there were no misunderstandings, etc.

I will let you know when I receive feedback from my team. Let me know if you have any questions in the interim.

Regards,

Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Tuesday, November 10, 2020 2:29 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Debra;

Please see attached the meeting notes I took from the meeting with EPA regarding methoxyfenozide on rice. Can you review and determine if you and the team agree with what was captured?

Thank you.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>

Sent: Monday, November 2, 2020 3:54 PM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you, Jenn.

I will provide the updated slides to my team and will let you know if we need anything more. Look forward to speaking with you tomorrow.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Monday, November 02, 2020 3:50 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Yes, we will be updating our slides for the meeting tomorrow. In the meantime, here is a new PDF with the new slides which replace the slides in the previous file (slide 25 and 26). Please note this new slide deck is 1 slide longer as added attendees at the beginning, so it pushes all the slides by 1.

Let me know if you need anything else.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>

Sent: Monday, November 2, 2020 3:40 PM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

Thank you for the update. Will you be updating slides to address this for tomorrow's meeting? Or can you direct me to the specific slides that I can reference when I send out your update to the team this afternoon?

Please let me know.
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Monday, November 02, 2020 2:27 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hello Debra:

After we had done the initial model runs, we noted that the units in the PFAM interface for solubility seemed to be incorrect. The interface specifies a unit of g/mL, which is not the normal units for this property. Using these incorrect

units, the results were artificially low. Checking the input guidance for PFAM, the correct unit should be mg/L (the normal units of expressing solubility) and we reran the modelling with the proper value. This gave higher EEC values, but the overall conclusion of the assessment still stand. In general, the position is that the laboratory DT50 are the most conservative, and will be the endpoints most likely used by EPA in the PFAM modelling. The information from the microcosm study provides additional refinement to a more real world level and lowers the RQ if used. However, in most cases we understand that EPA uses the most conservative value, which are the DT50 from the laboratory study, and the overall conclusion is that the aquatic field dissipation wouldn't provide additional data to inform the modelling or risk assessment.

Sorry for the last minute change, it was unexpected.

Thank you.

Jenn



From: Rate, Debra <Rate.Debra@epa.gov>

Sent: Monday, November 2, 2020 1:55 PM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

Let us know the changes as soon as you are able, so that we can provide the changes to the science teams.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Monday, November 02, 2020 12:30 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hello Debra;

When we were reviewing the PFRAM modelling input today, an error in the model was noticed in the units. We are in the process of rerunning with the correct information, but it will result in a different output for EECs. I will send that

information as soon as we have it run, and updated. My sincere apologies that the bug in the modelling wasn't noticed until today.

Jenn

From: Hughes, Jenn

Sent: Thursday, October 29, 2020 1:49 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hello Debra;

Please find attached a draft slide deck for your review prior to the meeting. There may be small changes made, but the overall content and rationale will remain the same. I have an agenda slide at the beginning of the slide deck, is this enough to meet your needs, or would you like a separate document with the agenda?

Thank you!

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>

Sent: Wednesday, October 28, 2020 11:24 AM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

That is great! Thank you for your assistance. I look forward to receiving the materials for the meeting.
Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Wednesday, October 28, 2020 11:17 AM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Debra;

We are currently working on finalizing our slide set. Rice commission is also providing a brief introduction to the use pattern as well, and are working on their slides. I will try to get the final version from them, but it will be draft, and the content for that section might change.

I should have the final slide set to you tomorrow.

We can also take notes, no problem.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Wednesday, October 28, 2020 9:04 AM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] Preparation for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

We are looking forward to having a robust discussion with your group from 10:00 – 11:00 am next Tuesday, Nov. 3, 2020. I have received “accepted responses” to the meeting invitation from nearly everyone on your list of participants, as well as mine.

Please provide me with your detailed agenda and presentation **today (10/28/20) or tomorrow** for distribution to the EPA teams. We need the materials in advance to ensure that we are prepared to address all of your questions/concerns regarding the data deficiencies and provide you with sound guidance for your next submissions.

With regard to the meeting, I will plan to facilitate the call by briefly welcoming participants by running through an EPA invitee roll call before handing it over to you to introduce your participants and to begin the meeting. I will also plan to provide reminders, as needed of remaining time, to ensure that we are able to discuss all of the agenda items and address all of the questions.

I would ask that Corteva be responsible for taking notes that can be circulated amongst the EPA participants for feedback and comment following the meeting. This will help confirm that information provided by EFED regarding your rationale and plans to move forward is not misunderstood and that subsequent submissions will be successful.

Again, thank you in advance for your meeting agenda and presentation materials.
Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Monday, October 26, 2020 4:41 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you Debra;

No questions for now. Appreciate all your help.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Monday, October 26, 2020 4:39 PM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

I sent out a calendar invite for the meeting to you and those on your attendee list. The meeting is set up as a Microsoft Teams meeting; however, call in information is also included.

Let me know if you have any questions.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Monday, October 26, 2020 4:08 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Debra:

I apologize, as I didn't include one additional name:

Luis Espino, Farm Advisor, laespino@ucanr.edu

Jenn

From: Hughes, Jenn
Sent: Monday, October 26, 2020 3:54 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Thank you.

I confirm that November 3 from 10-11 works for our team.

The attendees will be:

Jennifer Hughes, US Regulatory Leader, jennifer.hughes@corteva.com
Simone Bagnis, Environmental exposure assessor, simone.bagnis@corteva.com
Pat Havens, Environmental Exposure Assessment Leader, pat.havens@corteva.com
Stefan Kimmel, Ecotoxicology, stefan.kimmel@corteva.com
Laura Laughlin, Regulatory Science Leader, laura.laughlin@corteva.com

Brian Bret, Regulatory IR-4 Focal Point, brian.bret@corteva.com
Jill LeVake, Strategic Account Manager, jill.levake@corteva.com
Roberta Firoved, California Rice Commission, rfiroved@calrice.org
Deborah Carpenter, IR-4, dcarpent@njaes.rutgers.edu
Kenneth Samoil, IR-4, samoil@njaes.rutgers.edu

Thank you.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Monday, October 26, 2020 3:19 PM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

I have pulled together the responses from the agency participants to the meeting invitations I sent out last week. It appears that the best date for our group is:

November 3, 2020 from 10 – 11:00 am (Eastern Time)

Please confirm your agreement for this day and time and provide me with a list of participants (names and email addresses) for me to add to the calendar invite and I will out the calendar invitation with call-in options. Also, please provide any information you can provide ahead of time for the discussion would be greatly appreciated.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Wednesday, October 21, 2020 7:38 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Debra;

I have reviewed the dates with the calendars of my team, and the only date that wouldn't work is the Thursday, November 12 from 10-11.

Thank you.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Wednesday, October 21, 2020 4:02 PM

To: Hughes, Jenn <jennifer.hughes@corteva.com>

Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: [EXTERNAL] Proposed Dates/Times for Conference call with EPA (RD/EFED) to discuss Methoxyfenozide Petition for Use on California Rice- Data deficiencies

Hi Jenn,

I have proposed the following dates and time for the meeting with the EPA team. It will likely be a few days before I will have a consensus from the group on the best day(s). However, in the meantime, please let me know if any of these days or time will not work for you and your team.

Proposed Dates/Times:

Monday, Nov. 2, 2020 12-1 pm ET

Tuesday, Nov. 3, 2020 10-11 am ET

Wed., Nov. 4, 2020 11-12 pm ET

Thursday, Nov. 5, 2020 11-12 pm ET

Thurs. Nov. 12, 2020 10-11 am ET

Again, I will follow up in a few days with the best days/times (above) for EPA. Please follow-up with others in your group and IR-4, who you want to attend the meeting, and I am sure we will find a day and time that is agreeable for all.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>

Sent: Wednesday, October 21, 2020 2:07 PM

To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>

Subject: RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Hello Debra;

Thank you very much for the email. I appreciate the willingness for the meeting. For the meeting, what we would like to discuss is exactly what you propose below, which is to provide a presentation on our rationale and current data we have to waive or address the deficiencies to ensure we are on the right track and provide an opportunity for discussion prior to making the formal deficiency response. By having a discussion prior to the submission, it allows us to ensure we are considering all the topics that EFED would want us to in the response.

I also very much appreciate the flexibility, and apologize for the changing timelines. If a time in the morning doesn't work, we can make other times work too if needed.

As for the PRIA date, I understand that with these discussions and submissions, the PRIA date may move, which is acceptable and we can discuss more as we get closer if that works.

Thank you!

Warm Regards,

Jennifer Hughes

US Regulatory Team Leader, US Crop Protection Regulatory Affairs



265 Napoleon Street, Carleton Place, ON, K7C 2W8
T: +1 613-492-1888 | E: jennifer.hughes@corteva.com
[Twitter](#) | [LinkedIn](#) | www.corteva.com

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Wednesday, October 21, 2020 1:15 PM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Hi Jenn,

RD met with EFED's methoxyfenozide team on Monday to discuss the data deficiencies identified during the technical screen for the proposed California rice use.

Please note that RD and EFED are amenable to having a meeting with Corteva to discuss the deficiencies, and discuss your approach to resolving them. Per previous communications, I was following-up on your original request to have the meeting as soon as possible. I am now seeking to accommodate your more recent request to move the meeting to November. With that in mind, I am looking for times/dates for the first week of November preferably in the morning as you requested. I will need to expand the search into the second week of November to provide additional options.

In preparation for the meeting, it would be helpful if you can provide your detailed agenda and any questions you may have in the next few business days. RD will consult the your proposed agenda items and work with EFED to determine who should be invited to the meeting.

It is important to note that the meeting should not be seen by Corteva as an opportunity to debate the merits of data requirements that have been clearly specified in the part 40 CFR Part 158, and that have been identified as deficiencies by EFED for this action. This meeting will provide Corteva with an opportunity to discuss waiver requirements. You may provide a waiver request and/or rationale as to why a study is not needed, or how other studies may be used to address the same information; however, the agency would need to review to determine if the waiver sufficiently addresses and fulfills the guidelines. In other words, there is always a chance that the waiver could be denied. Further guideline information can be found at the following links:

- [OPPTS 835.6200 Aquatic \(Sediment\) Field Dissipation](#)
- [OCSP 850.6100: Environmental Chemistry Methods and Associated Independent Laboratory Validation](#)

As mentioned in previous emails, any new information and/or studies submitted to the agency will likely delay this tolerance petition and require renegotiation of the PRIA due date.

I will be in touch shortly with a few dates and times available for the meeting.

Regards,
Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Wednesday, October 21, 2020 8:34 AM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Hi Debra;

Just wanted to follow up on this, is there any availability?

Thank you!

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Tuesday, October 13, 2020 1:43 PM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Hi Jenn,

I am looking into the first week of November for calendar openings as requested. I will follow up with possible days/times.

Regards,
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Tuesday, October 13, 2020 12:56 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

I apologize I missed that email from Friday. I have been in and out of the office as my father passed, so I have been trying to catch up on emails when I can.

Do you have any availability in the first week of November? I apologize for the delay as I know I have been pushing for the meeting, but things are unexpectedly a little bit crazy with my schedule right now from a personal level and we need to put together our slides for the meeting as well, which will take time. Because we have a European member, a morning meeting (between 8-12) would be best, but we can try to make something work.

Thank you.

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Tuesday, October 13, 2020 12:44 PM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Hi Jenn,

Yes. I am working to coordinate the meeting with EFED. However, I am waiting to hear back from our internal team on the days/times that I sent to you on Friday.

I hope to be able to provide you with more definitive meeting times/dates later today or early tomorrow morning.

Thank you.
Debra

From: Hughes, Jenn <jennifer.hughes@corteva.com>
Sent: Tuesday, October 13, 2020 12:15 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: RE: Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Thank you Debra for sending this to me.

Would we still be able to have a discussion with EPA on the deficiencies, and the plans to address the concerns?

Thank you!

Jenn

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Tuesday, October 13, 2020 11:57 AM
To: Hughes, Jenn <jennifer.hughes@corteva.com>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Ertman, AWillis <Ertman.AWillis@epa.gov>
Subject: [EXTERNAL] Agency 75-day deficiency letter: Methoxyfenozide Petition for Use on California Rice

Good morning Jenn,

Attached is the 75-day letter regarding the deficiencies cited by EFED during the technical screen for the tolerance petition for the proposed use on rice. These data deficiencies are considered fatal flaws, and will keep the proposed California rice use from being evaluated by the agency.

As noted in the attached letter, these deficiencies must be adequately addressed before the agency would be able to move forward on the California rice use. Because the rice use application is bundled with various other actions, it is

important for you to be aware that time used to resolve the issues with rice may cause delays in evaluating the other uses and crop conversions associated with this petition.

Please feel free to share the attached correspondence regarding the fatal flaws in the rice use application with IR-4.

Please let us know if you have any questions.

Regards,
Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

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